

EXHIBIT A

From: Reents, Scott
Sent: Friday, June 12, 2015 8:44 AM
To: Meghan McCaffrey
Cc: Guzman, Ricardo; auerbach@mjaesq.com; Morag, Boaz S.; Dan.Mandell@Mishcon.com; Elizabeth.Rotenberg-Schwartz@Mishcon.com; Eric Lyttle; Tambay, Esti; Jaime Kaplan; Blackman, Jonathan I.; Terceno, Joaquin; Keith Forst; Liman, Lewis J.; Mike Lyle; Karlan, Matthew M.; nkumaraswami@sandw.com; Peter.D'Agostino@Mishcon.com; psummit@sandw.com; Robert.Gold@Mishcon.com; Stephen Hauss; Tim.McCarthy@Mishcon.com; Vincent.Filardo@Mishcon.com; William Burck; Selina MacLaren; Daniel Koffmann
Subject: RE: Rio Tinto v. Vale, et al. - Control Set Supplement

Meghan,

We provided a complete response, in consultation with our expert, to the issues you raised regarding purported "low text" documents and therefore view further discussion of the matter as wasteful and unnecessary. We are not required to make our expert available so that you may cross examine him about those answers. If there are questions you feel were left unanswered, let us know what they are and we will provide an appropriate response.

Scott

Scott Reents
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From: Meghan McCaffrey [mailto:meghanmccaffrey@quinnemanuel.com]
Sent: Thursday, June 11, 2015 1:24 PM
To: Reents, Scott
Cc: Guzman, Ricardo; auerbach@mjaesq.com; Morag, Boaz S.; Dan.Mandell@Mishcon.com; Elizabeth.Rotenberg-Schwartz@Mishcon.com; Eric Lyttle; Tambay, Esti; Jaime Kaplan; Blackman, Jonathan I.; Terceno, Joaquin; Keith Forst; Liman, Lewis J.; Mike Lyle; Karlan, Matthew M.; nkumaraswami@sandw.com; Peter.D'Agostino@Mishcon.com; psummit@sandw.com; Robert.Gold@Mishcon.com; Stephen Hauss; Tim.McCarthy@Mishcon.com; Vincent.Filardo@Mishcon.com; William Burck; Selina MacLaren; Daniel Koffmann
Subject: Re: Rio Tinto v. Vale, et al. - Control Set Supplement

Scott,

We want to hear from your expert on how low text documents impact their system. Unless you are now the Deloitte expert, you're not sufficient. We have made our expert available at your request, I'm sure you can do the same.

Thanks,
Meghan

On Jun 11, 2015, at 1:20 PM, Reents, Scott <sreents@cgsh.com> wrote:

Meghan,

The purported equivalence you draw between this manufactured dispute and our objections to your training process is a false one for reasons that should be too obvious to state, but which we can discuss today at 2 pm. There is no need for Deloitte to participate on our end, and I will not waste our client's money by asking them to do so. Please circulate a dial-in.

Scott

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From: Meghan McCaffrey [<mailto:meghanmccaffrey@quinnemanuel.com>]
Sent: Thursday, June 11, 2015 9:39 AM
To: Reents, Scott; Guzman, Ricardo; auerbach@mjaesq.com; Morag, Boaz S.;
Dan.Mandell@Mishcon.com; Elizabeth.Rotenberg-Schwartz@Mishcon.com; Eric Lyttle; Tambay, Esti;
Jaime Kaplan; Blackman, Jonathan I.; Terceno, Joaquin; Keith Forst; Liman, Lewis J.; Mike Lyle; Karlan,
Matthew M.; nkumaraswami@sandw.com; Peter.D'Agostino@Mishcon.com; psummit@sandw.com;
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William Burck; Selina MacLaren; Daniel Koffmann
Subject: RE: Rio Tinto v. Vale, et al. - Control Set Supplement

Scott,

We continue to be amazed by Vale's fascination with double standards, especially in light of the untimeliness of your objections to Rio Tinto's training, which came well over a month after Rio Tinto's production of its Seed Set (and comprise 82% of the documents that you belatedly disputed). Our objection is timely. You supplemented your Control Set, and we only naturally assumed that you would be folding these documents into your larger Control Set to create one new, cohesive set. If you are using your Control Sets differently, please let us know. In fact, we will take your offer for a meet and confer to discuss Vale's approach and Control Set. We further request that both of our experts be on the call to make sure that we're all on the same page with respect to the adequacy of low text documents for validation and training of your system.

Please let us know the availability of your expert from Deloitte and we will check with Kinny on his.

Thanks,
Meghan

Meghan McCaffrey
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From: Reents, Scott [<mailto:sreents@cgsh.com>]

Sent: Wednesday, June 10, 2015 4:56 PM

To: Meghan McCaffrey; Guzman, Ricardo; auerbach@mjaesq.com; Morag, Boaz S.; Dan.Mandell@Mishcon.com; Elizabeth.Rotenberg-Schwartz@Mishcon.com; Eric Lyttle; Tambay, Esti; Jaime Kaplan; Blackman, Jonathan I.; Terceno, Joaquin; Keith Forst; Liman, Lewis J.; Mike Lyle; Karlan, Matthew M.; nkumaraswami@sandw.com; Peter.D'Agostino@Mishcon.com; psummit@sandw.com; Robert.Gold@Mishcon.com; Stephen Hauss; Tim.McCarthy@Mishcon.com; Vincent.Filardo@Mishcon.com; William Burck; Selina MacLaren; Daniel Koffmann

Subject: RE: Rio Tinto v. Vale, et al. - Control Set Supplement

Meghan,

Your objection to the documents contained in our Control Set is both untimely and meritless. Vale produced its Control Set on April 6 and its Revised Control Set on May 1, and any objections to those productions were due within five business days of their production. You have objected to just one document (VALE-CNTRL_00022296) from the Supplemental Control Set, produced on May 29, which you have been told "likely" contains too little text to be processed by a predictive coding system. In fact, this document does contain sufficient text according to the criteria our vendor has determined are appropriate for its predictive coding system. With respect to Excel spreadsheets and images, our vendor has determined that such files should not be categorically excluded from consideration by its predictive coding system, so long as they contain a sufficient amount of extractable or OCR text. As you know, Vale and Rio Tinto are using different technologies to perform their predictive coding, and there is no reason to think that the technologies would have exactly the same technical requirements.

We see no need to meet and confer on this issue, but if necessary, I can speak tomorrow at 2 pm.

Regards,
Scott

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From: Meghan McCaffrey [<mailto:meghanmccaffrey@quinnemanuel.com>]

Sent: Wednesday, June 10, 2015 10:39 AM

To: Meghan McCaffrey; Guzman, Ricardo; auerbach@mjaesq.com; Morag, Boaz S.; Dan.Mandell@Mishcon.com; Elizabeth.Rotenberg-Schwartz@Mishcon.com; Eric Lyttle; Tambay, Esti; Jaime Kaplan; Blackman, Jonathan I.; Terceno, Joaquin; Keith Forst; Liman, Lewis J.; Mike Lyle; Karlan, Matthew M.; nkumaraswami@sandw.com; Peter.D'Agostino@Mishcon.com; psummit@sandw.com; Robert.Gold@Mishcon.com; Stephen Hauss; Tim.McCarthy@Mishcon.com; Vincent.Filardo@Mishcon.com; William Burck; Selina MacLaren; Daniel Koffmann; Reents, Scott

Subject: RE: Rio Tinto v. Vale, et al. - Control Set Supplement

Scott,

We have not heard back from you on our request for a meet and confer. Please let us know your availability to speak today.

Best,
Meghan

Meghan McCaffrey
Associate,
Quinn Emanuel Urquhart & Sullivan, LLP

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From: Meghan McCaffrey
Sent: Friday, June 05, 2015 8:32 PM
To: 'Guzman, Ricardo'; 'auerbach@mjaesq.com'; 'Morag, Boaz S.'; 'Dan.Mandell@Mishcon.com'; 'Elizabeth.Rotenberg-Schwartz@Mishcon.com'; Eric Lyttle; 'Tambay, Esti'; Jaime Kaplan; 'Blackman, Jonathan I.'; 'Terceno, Joaquin'; Keith Forst; 'Liman, Lewis J.'; Mike Lyle; 'Karlan, Matthew M.'; 'nkumaraswami@sandw.com'; 'Peter.D'Agostino@Mishcon.com'; 'psummit@sandw.com'; 'Robert.Gold@Mishcon.com'; Stephen Hauss; 'Tim.McCarthy@Mishcon.com'; 'Vincent.Filardo@Mishcon.com'; William Burck; Selina MacLaren; Daniel Koffmann; 'Reents, Scott'
Subject: RE: Rio Tinto v. Vale, et al. - Control Set Supplement

Scott,

We write in connection with your Supplemental Control Set production, which continues to raise concerns regarding the adequacy of your Control Set documents and training to date (although we have yet to receive your Training Set). In particular, we are concerned that your Control Set as currently comprised will not appropriately “aid in the Predictive Coding Process” or assist in determining “the prevalence of responsive information from the Document Universe,” as required by the parties’ Predictive Coding Protocol. Our review has uncovered a surprising number of documents in your Control Set coded as responsive that have very little text. Specifically, there are now 31 documents in Vale’s entire Control Set that are low text. We are advised that the predictive coding system is likely unable to process such low text documents and as a result, that they should not have been included in your Control Set (or any training set). VALE-CNTRL_00022296, produced with your Supplemental Control Set, is one such example—it contains only a single sentence. Needless to say, this raises serious concerns in our mind about the adequacy of your Control Set. Second, there are hundreds of documents – comprising 14.1% of your training documents produced to date – that are suspect filetypes such as Excel spreadsheets and pictures. We are again advised that without sufficient text these filetypes cannot be appropriately categorized by the predictive coding system.

Please let us know your availability for a meet and confer to discuss the above topics.

Thank you,
Meghan

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From: Guzman, Ricardo [<mailto:rguzman@cgsh.com>]
Sent: Friday, May 29, 2015 9:18 PM
To: auerbach@mjaesq.com; Morag, Boaz S.; Dan.Mandell@Mishcon.com; Elizabeth.Rotenberg-Schwartz@Mishcon.com; Eric Lyttle; Tambay, Esti; Jaime Kaplan; Blackman, Jonathan I.; Terceno, Joaquin; Keith Forst; Liman, Lewis J.; Meghan McCaffrey; Mike Lyle; Karlan, Matthew M.; nkumaraswami@sandw.com; Peter.D'Agostino@Mishcon.com; psummit@sandw.com; Robert.Gold@Mishcon.com; Stephen Hauss; Tim.McCarthy@Mishcon.com; Vincent.Filardo@Mishcon.com; William Burck
Subject: RE: Rio Tinto v. Vale, et al. - Control Set Supplement

Dear Counsel,

Password to supplemental production:
Rico.1

Best regards,

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From: Guzman, Ricardo
Sent: Friday, May 29, 2015 9:19 PM
To: auerbach@mjaesq.com; Morag, Boaz S.; Dan.Mandell@Mishcon.com; Elizabeth.Rotenberg-Schwartz@Mishcon.com; EricLyttle@quinnemanuel.com; Tambay, Esti; jaimekaplan@quinnemanuel.com; Blackman, Jonathan I.; Terceno, Joaquin; keithforst@quinnemanuel.com; Liman, Lewis J.; meghanmccaffrey@quinnemanuel.com; MikeLyle@quinnemanuel.com; Karlan, Matthew M.; nkumaraswami@sandw.com; Peter.D'Agostino@Mishcon.com; psummit@sandw.com; Robert.Gold@Mishcon.com; StephenHauss@quinnemanuel.com; Tim.McCarthy@Mishcon.com; Vincent.Filardo@Mishcon.com; WilliamBurck@quinnemanuel.com
Subject: Rio Tinto v. Vale, et al. - Control Set Supplement

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